

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Application No. 10/044,355

REMARKS

Claims 1-20 are all the claims pending in the application. Independent claims 1, 4, 11, 15 and 20 are being amended. New claims 21-25 have been added. No new matter has been introduced.

The Examiner has rejected claims 1-20 under 35 U.S.C. 103(a) as being allegedly unpatentable over Davies et al. (U.S. patent publication No. 2003/0088658) in view of Mercier et al. (U.S. patent publication No. 2003/0005119) and further in view of Todd et al. (U.S. patent publication No. 2003/0115073). Applicants respectfully traverse this rejection in view of Applicants' amendments to independent claims 1, 4, 11, 15 and 20 and further in view of the following arguments.

Specifically, amended independent claims 1, 4, 15 and 20 generally recite two new features of the invention wherein (1) a type of the account information is based on a type of a user of the allocated storage volumes and based on stored management information and (2) a total number of the assigned switch ports or a total capacity of the allocated storage volumes are selected based on the type of the user for making the account information. Without admitting that Davies et al., Mercier et al. or Todd et al., taken singly or in combination, teach or suggest any other limitations of the pending claims, Applicants respectfully submit that none of the aforesaid references discloses the above features (1) and (2).

Mercier et al. is directed to a system for automated creation of application data paths in storage area networks. Mercier et al. does mention that some cost information is generated based on the actual devices used within the data path (see paragraph [0015] in Mercier et al.).

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Specifically, at paragraph 0015 Mercier et al. teaches calculating “cost” information based on the actual infrastructure used: “many customers purchase expensive hardware in hopes of achieving high levels of availability. A calculation of the cost (switch ports used, HBA ports used, # gigabytes used) for each party may be provided to the customers to analyze their cost for performance and availability achieved...”

Todd et al. is directed to a method of managing workflows related to storage services provided by a service provider to a customer (via a management system). Todd et al. discloses that the administrator of the service provider may handle the billing information as the account information. However, neither Mercier et al. nor Todd et al. teaches or suggests the feature of the claimed invention of making different account information for different users such as billing information and payment information, as shown in Figs. 2 and 19-22 of the specification. Different users may include customers and vendors (SAN switch vendor, storage vendor). As the Examiner would appreciate, neither Mercier et al. nor Todd et al. teach or suggest that account information for different types of users should be different.

In addition, neither Mercier et al. nor Todd et al., nor combination thereof, teaches or suggests that a total number of the assigned switch ports or the total capacity of the allocated storage volumes are selected based on the type of the user for making the account information. The third applied reference, Davies et al., is directed to a method and system for assisting an administrator of a SAN system and fails to remedy the aforesaid deficiencies of Mercier et al. and Todd et al. For this reason, amended claims 1, 4, 15 and 20 are patentable over the combination of Davies et al. with Mercier et al. and Todd et al.

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Amended claim 11 recites newly added limitations which are generally similar to newly added limitations of claims 1, 4, 11, 15 and 20 and, therefore, patentability arguments advanced by applicants with respect to claims 1, 4, 11, 15 and 20 also apply to claim 11. Thus, claim 11 is patentable over Davies et al., Mercier et al. and Todd et al. as well.

With respect to the rejection of dependent claims 2, 3, 5-10, 12-14 and 16-19, while continuing to traverse the Examiner's characterization of the teachings of the references used by the Examiner in rejecting these claims, Applicants respectfully submit that the rejection of these claims is rendered moot by the present amendment of the respective parent claims and that these claims are patentable by definition, by virtue of their dependence upon the patentable independent claims 1, 4, 11 and 15.

With respect to new claims 21-25, Applicants respectfully submit that none of the cited prior art, alone or in combination, teaches or suggest features of the invention generally recited in those claims, and specifically, wherein if the user is a customer, the total number of allocated switch ports and the total capacity of allocated storage volumes are used; if the user is a SAN switch vendor, the total number of allocated switch ports is used; and if the user is a storage vendor, the total capacity of allocated storage volumes is used. Thus, new claims 21-25 are also patentable over Davies et al., Mercier et al. and Todd et al. In addition, new claims 21-25 are patentable at least due to their dependency on patentable claims 1, 4, 11, 15 and 20.

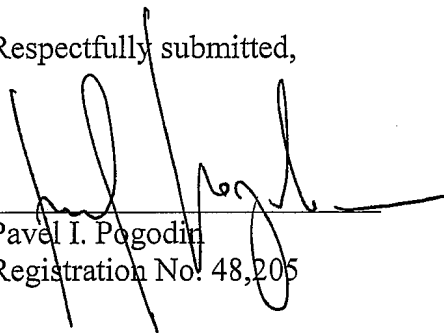
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

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Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Pavel I. Pogodin
Registration No. 48,205

SUGHRUE MION, PLLC
Telephone: (650) 625-8100
Facsimile: (650) 625-8110

MOUNTAIN VIEW OFFICE

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CUSTOMER NUMBER

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